

March 3, 2025

*VIA ECF*

Hon. Katherine Polk Failla  
United States District Court Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square, Room 618  
New York, NY 10007

**MEMO ENDORSED**

Re: *Dinosaur Financial Group LLC et al. v. S&P Global, Inc. et al.*, Case No. 22-cv-1860

Dear Judge Failla:

We represent Defendants S&P Global. Inc., the American Bankers Association (“ABA”), and FactSet Research Systems Inc. (collectively “Defendants”). Defendants are filing today their letter requesting an informal conference regarding an anticipated motion to compel production of documents and communications. Pursuant to the Protective Order (ECF No. 125) and Rule 9 of this Court’s Individual Rules of Civil Procedure (“Rule 9”), Defendants request permission to file their letter and Exhibit 3 thereto in partially redacted form and seal the documents attached as Exhibits 1 and 2 to the letter.

In accordance with Rule 9, Defendants are filing: (i) a redacted version of their letter with sealed and redacted exhibits and (ii) a copy of the letter with proposed redactions and exhibits in selected view. Pursuant to Rule 9.B.ii., Defendants will also email Chambers with copies of these documents.

The letter and exhibits contain, paraphrase or quote “Discovery Material” that is deemed “Highly Confidential Material” under Paragraph 23 of the Protective Order. (ECF No. 125). Defendants are seeking permission to seal these materials to comply with the Protective Order and Rule 9. Defendants reserve the right to challenge any confidentiality designations as appropriate.

Respectfully submitted,

/s/ Eric J. Stock

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Application GRANTED. The Clerk of Court is directed to maintain docket entry 186 under seal, viewable to the Court and the parties only.

The Clerk of Court is further directed to terminate the pending motion at docket entry 184.

Dated: March 4, 2025  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE